

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MARVIN A. EATON, Individually and on  
Behalf of All Others Similarly Situated,  
Plaintiff(s),

V.

EDAP TMS S.A., MARC  
OCZACHOWSKI, and ERIC SOYER,  
Defendants.

**Case No. 1:14-cv-06069-LGS**

RONNIE HADDAD, Individually and on  
Behalf of All Others Similarly Situated,  
Plaintiff(s),

V.

EDAP TMS S.A., MARC  
OCZACHOWSKI, and ERIC SOYER,  
Defendants.

**Case No. 1:14-cv-06188-LGS**

**DECLARATION OF JEREMY A. LIEBERMAN IN SUPPORT OF THE MOTION  
BY RYAN H. TENNEBAR FOR CONSOLIDATION,  
APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF COUNSEL**

I, Jeremy A. Lieberman, declare:

1. I am an attorney with the law firm of Pomerantz LLP [Proposed] Lead Counsel in the above-captioned actions (the “Related Actions”) and have personal knowledge of the facts set forth herein. I make this Declaration in support of the motion of Ryan H. Tennebar (“Tennebar”) for Consolidation, Appointment as Lead Plaintiff, and approval of Counsel.

3. Attached hereto as Exhibit A is a true and correct copy of the press release published over *GLOBE NEWSWIRE* in the first-filed action on August 4, 2014.

4. Attached hereto as Exhibit B is a true and correct copy of the Certification executed by Tennebar in the Related Actions.

5. Attached hereto as Exhibit C is a true and correct copy of the chart detailing Tennebar’s losses in the Related Actions.

6. Attached hereto as Exhibit D is a true and correct copy of the firm resume for Pomerantz LLP.

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct.

Executed this 3rd day of October, 2014, in New York, New York.

/s/ Jeremy A. Lieberman  
Jeremy A. Lieberman